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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT  
 ADDICTION/PERSONAL INJURY  
 PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

*A. B., by and through her Guardian Ad  
 Litem, Jeffrey Brown v. Meta Platforms Inc.,  
 et al., 4:25-cv-03927;*

*S.V., filed on behalf of minor S.V. v. Meta  
 Platforms, Inc.; Instagram, LLC; Bytedance  
 Inc.; Bytedance Ltd.; TikTok, Ltd.; TikTok,  
 LLC; TikTok, Inc., 4:25-cv-03982;*

*A.W. filed on behalf of minor B.W. v. Meta  
 Platforms, Inc.; Instagram, LLC and Snap,  
 Inc., 4:25-cv-04208;*

*T.W. filed on behalf of minor A.W. vs. Meta  
 Platforms, Inc., Instagram, LLC, ByteDance,  
 Ltd., ByteDance, Inc., TikTok, Ltd., TikTok,  
 LLC., TikTok, Inc. and Snap, Inc., 4:25-cv-  
 04474;*

*E.A., individually and as next of friend to  
 minor Plaintiff A.A. v. Meta Platforms, Inc.  
 et al., 4:25-cv-04965;*

*N. C., by and through her Guardian Ad  
 Litem, Andrew Cash v. Meta Platforms, Inc.,  
 et al., 4:25-cv-06334;*

**PLAINTIFFS' FIFTEENTH  
 CONSOLIDATED EX PARTE  
 APPLICATION FOR APPOINTMENT OF  
 GUARDIANS AD LITEM**

1 *J.L. filed on behalf of minor E.L. v. Meta*  
 2 *Platforms, Inc.; Instagram, LLC; Bytedance*  
 3 *Inc.; Bytedance Ltd.; TikTok, Ltd.; TikTok,*  
 4 *LLC; TikTok, Inc. and Snap, Inc., 4:25-cv-*  
 5 *06381;*

6 *A.W., by and through her Guardian Ad*  
 7 *Litem, Crystal Welch v. Meta Platforms, Inc.,*  
 8 *et al., 4:25-cv-06619;*

9 *J.W. filed on behalf of minor A.W. v. Meta*  
 10 *Platforms, Inc.; Instagram, LLC; Bytedance*  
 11 *Inc., Bytedance, Ltd., TikTok, Ltd., TikTok,*  
 12 *LLC; TikTok, Inc. and Snap, Inc., 4:25-cv-*  
 13 *07186;*

14 *N.E. filed on behalf of minor T.E. v. Meta*  
 15 *Platforms, Inc.; Instagram, LLC; Bytedance*  
 16 *Inc., Bytedance, Ltd., TikTok, Ltd., TikTok,*  
 17 *LLC and TikTok, Inc., No. 4:25-cv-7205;*

18 *A.S. filed on behalf of minor A.S. v. Meta*  
 19 *Platforms, Inc.; Instagram, LLC; Bytedance*  
 20 *Inc., Bytedance, Ltd., TikTok, Ltd., TikTok,*  
 21 *LLC and TikTok, Inc., No. 4:25-cv-7218.*

## APPLICATION

22 Pursuant to this Court’s Order Regarding Appointment of Guardian *Ad Litem* (“Guardians  
 23 *Ad Litem* Order”) (ECF No. 122 at 3), Plaintiffs’ Liaison Counsel, Jennie Lee Anderson, hereby  
 24 submits Plaintiffs’ Fifteenth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad*  
 25 *Litem* (“*Ex Parte* Application”) for this Court’s consideration.

26 “Fit parents are presumed to act in the best interests of their children.” *J.B. by &*  
 27 *Through Billiet v. Tuolumne Cnty. Superintendent of Sch.*, No. 19-cv-0858-NONE-EPG, 2021  
 28 WL 3115195, at \*2 (E.D. Cal. July 22, 2021) (citing *Troxel v. Granville*, 530 U.S. 57, 66 (2000);  
*Doe v. Heck*, 327 F.3d 492, 521 (7th Cir. 2003)); *see also Brown v. Alexander*, No. 13-cv-01451-  
 RS, 2015 WL 7350183, at \*1 (N.D. Cal. Nov. 20, 2015) (“In general, a parent who is also a party  
 to the lawsuit is presumed to be a suitable guardian ad litem, and so the court often appoints the  
 parent as guardian ad litem upon receipt of an ex parte application without exercising much  
 discretion.”) (citation omitted). Absent a conflict of interest, “[a] parent is generally appointed  
 guardian ad litem.” *A.G. v. South Bay Dreams Coop., Inc.*, No. 16-cv-02598-RNB, 2018 WL

2002370, at \*3 (S.D. Cal. Apr. 30, 2018) (citing *Anthem Life Ins. Co. v. Olguin*, No. 06-cv-01165-AWI NEW (TAG), 2007 WL 1390672, at \*3 (E.D. Cal. May 9, 2007)); accord *J.M. v. Liberty Union High Sch. Dist.*, No. 16-cv-05225-LB, 2016 WL 4942999, at \*2 (N.D. Cal. Sept. 16, 2016). However, “[w]hen there is a potential conflict between a perceived parental responsibility and an obligation to assist the court in achieving a just and speedy determination of the action, a court has the right to select guardian ad litem who is not a parent if that guardian would best protect the child’s interests.” *J.M.*, 2016 WL 4942999, at \*1 (citations omitted) (internal quotation marks omitted).

Attached as Exhibits 1-11 to the Declaration of Jennie Lee Anderson in Support of Plaintiffs’ Fifteenth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“Anderson Decl.” or “Anderson Declaration”) are the *Ex Parte* Applications for Appointment of Guardians *Ad Litem* (“Applications”) submitted by the parents and/or legal guardians of individual minor Plaintiffs in the following cases.

- *A. B., by and through her Guardian Ad Litem, Jeffrey Brown v. Meta Platforms Inc., et al.*, 4:25-cv-03927 (Exhibit 1);
- *S.V., filed on behalf of minor S.V. v. Meta Platforms, Inc.; Instagram, LLC; Bytedance Inc.; Bytedance Ltd.; TikTok, Ltd.; TikTok, LLC; TikTok, Inc.*, 4:25-cv-03982 (Exhibit 2);
- *A.W. filed on behalf of minor B.W. v. Meta Platforms, Inc.; Instagram, LLC and Snap, Inc.*, 4:25-cv-04208 (Exhibit 3);
- *T.W. filed on behalf of minor A.W. vs. Meta Platforms, Inc., Instagram, LLC, ByteDance, Ltd., ByteDance, Inc., TikTok, Ltd., TikTok, LLC., TikTok, Inc. and Snap, Inc.*, 4:25-cv-04474 (Exhibit 4);
- *E.A., individually and as next of friend to minor Plaintiff A.A. v. Meta Platforms, Inc. et al.*, 4:25-cv-04965 (Exhibit 5);
- *N. C., by and through her Guardian Ad Litem, Andrew Cash v. Meta Platforms, Inc., et al.*, 4:25-cv-06334 (Exhibit 6);

- 1 • *J.L. filed on behalf of minor E.L. v. Meta Platforms, Inc.; Instagram, LLC; Bytedance*  
2 *Inc.; Bytedance Ltd.; TikTok, Ltd.; TikTok, LLC; TikTok, Inc. and Snap, Inc.*, 4:25-cv-  
3 06381 (Exhibit 7);
- 4 • *A.W., by and through her Guardian Ad Litem, Crystal Welch v. Meta Platforms, Inc., et*  
5 *al.*, 4:25-cv-06619 (Exhibit 8);
- 6 • *J.W. filed on behalf of minor A.W. v. Meta Platforms, Inc.; Instagram, LLC; Bytedance*  
7 *Inc., Bytedance, Ltd., TikTok, Ltd., TikTok, LLC; TikTok, Inc. and Snap, Inc.*, 4:25-cv-  
8 07186 (Exhibit 9);
- 9 • *N.E. filed on behalf of minor T.E. v. Meta Platforms, Inc.; Instagram, LLC; Bytedance*  
10 *Inc., Bytedance, Ltd., TikTok, Ltd., TikTok, LLC and TikTok, Inc.*, No. 4:25-cv-7205  
11 (Exhibit 10);
- 12 • *A.S. filed on behalf of minor A.S. v. Meta Platforms, Inc.; Instagram, LLC; Bytedance*  
13 *Inc., Bytedance, Ltd., TikTok, Ltd., TikTok, LLC and TikTok, Inc.*, No. 4:25-cv-7218  
14 (Exhibit 11).

15 Exhibits 1-11 to the Anderson Declaration are Applications submitted to Plaintiffs' Liaison  
16 Counsel for filing since the last guardian *ad litem* submission. The Applications attached to the  
17 Anderson Declaration as Exhibits 1-11 are consistent with Attachment A to this Court's Guardian  
18 *Ad Litem* Order (ECF No. 122) and include (1) the applicant's name and contact information  
19 (including address, email, and telephone number); (2) the name, case number, state of domicile  
20 (and its minimum age of capacity); (3) a sworn statement that the applicant is the parent and/or  
21 legal guardian of the minor plaintiff; and (4) a sworn statement affirming that the applicant is fully  
22 competent and qualified to understand and protect the rights of the minor plaintiff and has no  
23 interests adverse to the interests of that person. Anderson Decl. ¶ 14.

24 Pursuant to this Court's Guardians *Ad Litem* Order, the Applications by parents and/or  
25 legal guardians in the cases listed above are deemed presumptively approved upon filing, as there  
26

is no apparent conflict between the applicants' parental responsibility and their obligation to assist the Court in "achieving a just and speedy determination of the action." ECF No. 122 ¶ 4 (citing *J.M.*, 2016 WL 494299, at \*1). This Court also ordered that, absent the filing of an objection, the presumptive approval shall become final fifteen days after the date this *Ex Parte* Application is filed. ECF No. 122 ¶ 5. The objection period will close on October 20, 2025.

Accordingly, Plaintiffs submit herewith a [Proposed] Order Granting *Ex Parte* Applications and Appointing Guardian *Ad Litem* appointing the parent and/or legal guardian named in the Applications submitted in the case listed above.

Dated: October 3, 2025

Respectfully submitted,

**ANDRUS ANDERSON LLP**

/s/ Jennie Lee Anderson

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